510(k) Summary AOS Marker Seeds

MAY 2 2 2007

Alpha-Omega Services, Inc. 9156 Rose Street Bellflower, CA 90706 Tel: (800) 346-7894 Fax: (562) 804-0604 Bob A. Robnett July 2006

DEVICE NAME

AOS Marker Seeds

PROPRIETARY NAME

AOS Marker Seeds

COMMON/USUAL NAME

Marker Seeds

CLASSIFICATION

21 CFR 892.5700, Product Code: JAQ, Class II

PREDICATED DEVICES

AOS Marker Seeds (Preamendment, See Appendix A)

DESCRIPTION

AOS Marker Seeds are small, cylindrical pieces of 24k gold or silver, which are easily visible with radiography imaging systems.

INTENDED USE

AOS Marker Seeds are used to provide reference positions around a proposed treatment site in order to re-apply a radionuclide source into the body or to the surface of the body for multiple sessions of radiation therapy.

CONTRAINDICTIONS

Single Use Device

PERFORMANCE STANDARDS

No performance Standards for Brachytherapy Applicators are in effect at this date.

SUBSTANTIAL EQUIVALENCE

AOS Marker Seeds are substantial equivalence to the AOS Marker Seeds (Preamendment). A comparison summary of technological characteristics is listed below. See Sections 7 Device Description for detailed information.

NEW DEVICE: AOS Marker Seeds, 24k Gold PREDICATE: AOS Marker Seeds, 24k Gold

DESIGN: Both the new and predicate device share the

same design

MATERIAL: Both the new and predicate device are

constructed of the same materials

SINGLE USE: Both the new and predicate device are Single

Use Only.

STERILE: New device is sterile. Predicate is non-sterile

NEW DEVICE: AOS Marker Seeds, 24k Silver PREDICATE: AOS Marker Seeds, 24k Silver

DESIGN: Both the new and predicate device share the

same design

MATERIAL: Both the new and predicate device are

constructed of the same materials

SINGLE USE: Both the new and predicate device are Single

Use Only.

STERILE: New device is sterile. Predicate is non-sterile

Conclusions

The Conclusion drawn from the above is that the Marker Seeds are equivalent in safety and efficacy to their predicate devices

DEPARTMENT OF HEALTH & HUMAN SERVICES



Food and Drug Administration 9200 Corporate Blvd. Rockville MD 20850

MAY 2 2 2007

Mr. Bob A. Robnett
Director, Regulatory Affairs & Quality
Alpha-Omega Services, Inc.
9156 Rose Street
P.O. Box 789
BELLFLOWER CA 90706

Re: K062825

Trade/Device Name: AOS Marker Seeds Regulation Number: 21 CFR §892.5730

Regulation Name: Remote controlled radionuclide applicator system

Regulatory Class: II Product Code: KXK Dated: May 2, 2007 Received: May 3, 2007

Dear Mr. Robnett:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the <u>Code of Federal Regulations</u>, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.



Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at one of the following numbers, based on the regulation number at the top of this letter:

| 21 CFR 876.xxxx | (Gastroenterology/Renal/Urology) | 240-276-0115 |
|-----------------|----------------------------------|--------------|
| 21 CFR 884.xxxx | (Obstetrics/Gynecology) | 240-276-0115 |
| 21 CFR 892.xxxx | (Radiology) | 240-276-0120 |
| Other | | 240-276-0100 |

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html

Sincerely yours,

Manaya Brogdon Nancy C. Brogdon

Director, Division of Reproductive, Abdominal, and Radiological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

Indications For Use

| 510(k) Number (if known): | K062825 |
|---------------------------|---------|
|---------------------------|---------|

Device Name: AOS Marker Seeds

Indications For Use: AOS Marker Seeds are used to provide reference positions around a proposed treatment site in order to re-apply a radionuclide source into the body or to the surface of the body for multiple sessions of radiation therapy.

Alpha-Omega Services (AOS) Marker Seeds are small cylindrical pieces of 24k gold or silver, which are easily visible with radiography imaging systems.

Prescription Use: Yes (Part 21 CFR 801 Subpart D)

-AND/OR

Over-The Counter Use: NO (21 CFR 801 Subpart C

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Division of Reproductive, Abdominal, and

Radiological Devices 510(k) Number

Concurrence of CDRH, Office or Device Evaluation